

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KEVIN MCKEITHER	:	CIVIL ACTION
Petitioner,		
V.	:	
THERESA DELBALSO, et al.	:	No. 14-1628
Respondents.		

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PETITION FOR  
WRIT OF HABEAS CORPUS**

Petitioner is a Pennsylvania state prisoner who was convicted of burglary, robbery, rape, and related charges following a vicious attack on an elderly woman, and sentenced to an aggregate term of 30 to 60 years' imprisonment. In 2014, he filed the above-captioned *Petition for Writ of Habeas Corpus*. This Court directed the Commonwealth to file a brief for respondents by May 1, 2014. Unfortunately, the Commonwealth cannot meet that deadline, and respectfully requests more time.

This is the Commonwealth's first request for an extension in this matter. During the past 30 days, the assigned attorney has finished briefs in several cases, including M. Leach v. Bickell, No. 13-5252; Z. Thomas v. Commonwealth of Pennsylvania, No. 14-171; and S. Shields v. Rozum, 13-7657.

The Commonwealth apologizes for missing the deadline but hopes that a response may be prepared within the next 30 days. Accordingly, the Commonwealth asks for a 30-day extension for filing its response.

Respectfully submitted,

/s/ Jennifer O. Andress

JENNIFER O. ANDRESS  
Assistant District Attorney

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**CERTIFICATE OF SERVICE**

I, JENNIFER O. ANDRESS, counsel for appellants, hereby certify that on May 1, 2014, a copy of the foregoing motion was served by first-class U.S. Mail on petitioner:

Kevin McKeither  
HV-5414  
660 State Route 11  
Hunlock Creek, PA 18621

*/s/ Jennifer O. Andress*

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JENNIFER O. ANDRESS  
Assistant District Attorney

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2014,  
the Commonwealth's response to the Petition for Writ of Habeas Corpus is due on or before June  
1, 2014.

BY THE COURT:

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J.